

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 12/9/2020

## PAVIA & HARCOURT LLP

230 Park Avenue  
New York, NY 10169  
Telephone: (212) 980-3500  
Facsimile: (212) 980-3185  
www.pavialaw.com

PARIS  
FORENSIS  
98 Boulevard Malesherbes  
75017 Paris

Brandon C. Sherman  
Associate  
Direct Dial: 212-508-2314  
Direct Fax: 212-735-7914  
bsherman@pavialaw.com

December 4, 2020

By ECF

Judge Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: LTS Management Company, LLC v. Shah 1:20-cv-04227(AT)

Dear Judge Torres:

Pavia & Harcourt LLP is counsel to Defendant/Counterclaim-Plaintiff Rashid Ali Shah ("Mr. Ali Shah"). This joint letter requesting an adjournment of certain discovery deadlines set forth in the Civil Case Management Plan and Scheduling Order, dated August 19, 2020 (Docket No. 22) is submitted pursuant to Section I.C of this Court's Individual Practices in Civil Cases.

Currently, the deadline to complete all depositions and fact discovery is December 17, 2020, there is a Case Management Conference scheduled for January 6, 2021, and the deadline to complete expert discovery of February 1, 2021.

The parties have completed some discovery, but additional time is needed on both sides. Given the respective professional commitments of counsel between now and the New Year, we anticipate taking depositions beginning in mid-January. Accordingly, the parties respectfully request that the above deadlines be adjourned as follows:

- Deadline to complete depositions and fact discovery: February 17, 2021
- Case management conference: on or after March 9, 2021
- Expert discovery: April 5, 2021

This request is made with the consent of all parties and is the first request for an extension of any dates set forth in the Civil Case Management Plan and Scheduling Order.

December 4, 2020  
Judge Analisa Torres  
Page 2

Respectfully submitted,

*/s/ Brandon C. Sherman*

Brandon C. Sherman

GRANTED. By **February 17, 2021**, the parties shall complete fact discovery. By **April 5, 2021**, the parties shall complete expert discovery. The case management conference scheduled for January 6, 2021, is ADJOURNED to **March 9, 2021**, at **10:40 a.m.** By **March 2, 2021**, the parties shall file their joint status letter.

SO ORDERED.

Dated: December 9, 2020  
New York, New York



---

ANALISA TORRES  
United States District Judge